

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:) Case No. 25-30004
)
THE RUINS, LLC) Chapter 11
)
Debtor)
_____)

Notice Withdrawing Opposition to Motion for Stay Relief

Comes now The Ruins, LLC (the “Ruins” or the “Debtor”), by and through undersigned counsel, and withdraws the opposition, DE #66, to the motion for relief from the automatic stay (the “Motion”), DE #58, and in furtherance thereof notes as follows:

Red River State Bank (“RRSB”) seeks relief from the automatic stay enshrined in Section 362 of Title 11 of the United States Code, for purposes of pursuing a judicial foreclosure action against the Ruins in state court. The Debtor’s defenses to the state court action are largely—albeit not entirely—coterminous with the claims being pursued in an adversary proceeding in this Honorable Court. *See Generations on 1st, LLC, et al. v. Red River State Bank*, Case No. 25-07009 (Bankr. D.N.D. 2025) (the “Adversary Proceeding”).

While the Debtor believes there to exist various good and meritorious defenses to the Motion, as laid out in the opposition and as otherwise arising at law and in equity, the Debtor is also aware that judicial economy likely favors adjudication of the underlying state court claims in concert with the Adversary Proceeding. And it is thusly sensible to allow relief from the automatic stay to be granted so the Debtor may remove the state court proceedings to the United States District Court for the District of South Dakota, 28 U.S.C. § 1452; Fed. R. Bankr. P. 9027, and then promptly seek a transfer to this Honorable Court, 28 U.S.C. § 1412; Fed. R. Bankr. P. 7087, so the pending matter may be consolidated with the Adversary Proceeding. This will allow the same

issues—taking the form of both affirmative claims and affirmative defenses—to be tried before a single court, to avoid the risks of inconsistent factual findings, to avoid the potential for inconsistent legal conclusions, to avoid the perils of duplicative discovery, and to generally promote the efficient administration of justice.

WHEREFORE, the Debtor hereby withdraws its opposition to the Motion and prays this Honorable Court (i) enter an order affording relief from the automatic stay; and (ii) afford such other and further relief as may be just and proper.

Respectfully Submitted,

Dated: September 25, 2025

By: /s/ Maurice B. VerStandig
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of September, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig
Maurice B. VerStandig